

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:
BRANDON L HEITMANN

CHAPTER 13
CASE NO. 24-41956-MAR
JUDGE MARK A RANDON

Debtor _____ /

**TRUSTEE'S OBJECTION TO DEBTOR'S APPLICATION TO EMPLOY KOTZ SANGSTER
WYSOCKI PC AS SPECIAL COUNSEL**

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and objects to the Debtor's Application to Employ Kotz Sangster Wysocki PC as Special counsel as follows:

1. Trustee objects to debtor's application to employ special counsel as the debtor will likely incur substantial post-petition debt to the detriment of his pre-petition creditors and Chapter 13 Plan. The debtor's Plan is already underfunded and infeasible. The amended Plan and Schedules do not support sufficient funding to pay any attorney fees.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny the relief requested.

Dated: October 21, 2024

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ KRISPEN S. CARROLL-mcs

Krispen S. Carroll (P49817)

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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed the **Trustee's Objection to Debtor's Application to Employ Kotz Sangster Wysocki PC as Special counsel** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

ROBERT N BASSEL
P O BOX T
CLINTON, MI 49236

October 21, 2024

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit
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